

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA**

THE STATE OF LOUISIANA,
By and through its Attorney General, JEFF
LANDRY,

THE STATE OF MONTANA,
By and through its Attorney General, AUSTIN
KNUDSEN,

THE STATE OF ARIZONA,
By and through its Attorney General, Mark
Brnovich, et al.,

No. 6:22-cv-885

PLAINTIFFS,

v.

XAVIER BECERRA, in his official capacity as
Secretary of Health and Human Services; et al.,

DEFENDANTS.

DECLARATION OF TOMMY ROMERO

I, Tommy Romero, declare as follows:

1. I am over 18 years of age and am competent to make this declaration. I submit this declaration in support of Plaintiffs' Motion for Preliminary Injunction. This declaration is based on my personal and professional knowledge, law enforcement expertise, and the information available to me in my positions in public service.

2. I began my law enforcement career with the Iberia Parish Sheriff's Department in 1978, rising to Shift Lieutenant. From 1983 until 2016, I served with the Louisiana State Police. From 2016 until 2018, I served in the Louisiana Attorney General's Office. I have served on special assignments with the FBI's Anti-Terrorism Task Force and with the U.S. Customs Service.

3. In 2019, I was elected Sheriff of Iberia Parish.

4. Migrants coming from the border are sometimes transporting drugs into or across Louisiana, including in or through Iberia Parish. In the past 24 months, the Iberia Parish Sheriff's Office has confiscated drugs suspected to have been moved from the border into Louisiana, including but not limited to marijuana, fentanyl, methamphetamine, and heroin. This criminal activity requires substantial law enforcement resources to apprehend, detain, prosecute, and incarcerate the individuals involved. To state the obvious, the Iberia Parish Sheriff's Office is adversely affected by having to devote resources to respond to this criminal activity. Those resources are necessarily diverted from other public safety activities.

5. In my professional opinion, a pause or significant decrease in ICE removals will incentivize undocumented immigration. This will most certainly encourage an increase in the number of migrants who attempt to illegally cross the border into the United States and, in turn, into Louisiana.

6. Further declarant sayeth naught.

I declare under penalty of perjury under the laws of the United States and the State of Louisiana that the foregoing is true and correct to the best of my knowledge.

Executed April 11, 2022, in New Iberia, Louisiana.

